



November 11, 2022

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By ECF

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Hon. Valerie Figueredo
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: **Civil Rights Corp, et al., v. Steven Stein Cushman, et al., Dkt. No. 21-cv-9128**

Dear Judge Figueredo:

This firm represents the Plaintiffs in the above-captioned case. We submit this joint letter on behalf of all parties in response to the Court's November 4, 2022 Order. Dkt. No. 133.

The parties have commenced settlement conversations. While the parties have not yet reached an agreement in principle, they believe that resolution by settlement is possible and that it would be beneficial to receive guidance from the Court. The parties defer to the Court's availability and schedule but propose that the upcoming November 21, 2022 conference proceed as scheduled so that the parties and the Court may engage in a preliminary conversation about next steps, including the possibility of staying or extending pending discovery deadlines and scheduling a settlement conference before the Court.

Respectfully submitted,

/s/ Elisabeth A. Shane

/s/ Gargi Chaudhuri

Counsel for Plaintiffs

[additional signatures below]

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